

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

DEBRA BLOOMER, Individually, And as	)	
Mother and Guardian of JONATHAN BLOOMER,	)	Case No. 8:05 CV 503
a Minor,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
BRIDGESTONE FIRESTONE NORTH	)	
AMERICAN TIRE, LLC,	)	
A Tennessee Limited Liability Company	)	
	)	
Defendant.	)	

**DEFENDANT'S OBJECTIONS TO PLAINTIFF'S EXHIBITS**

PLAINTIFFS' EXHIBIT	OBJECTIONS
Medical records - Lincoln Family Medicine Center	805. Firestone reserves any further objections until exhibit is produced by Plaintiffs.
Medical records - Dr. Tim Watt	None.
Medical records - Dr. Mitchell Henry	805. Firestone reserves any further objections until exhibit is produced by Plaintiffs.
Medical records - Dr. Robert Arias	None.
Medical records - Madonna Rehabilitation Hospital	805. Firestone reserves any further objections until exhibit is produced by Plaintiffs.
Medical records - Dr. Mario Mota - Ophthalmology Associates	805. Firestone reserves any further objections until exhibit is produced by Plaintiffs.
Medical records - Dr. Leslie Hellbusch	805. Firestone reserves any further objections until exhibit is produced by Plaintiffs.
Medical records - BryanLGH Medical Center East	805. Firestone reserves any further objections until exhibit is produced by Plaintiffs.
Neuropsych Report - Dr. Renee Hudson	805. Firestone reserves any further objections until exhibit is produced by Plaintiffs.
Medical records - Dr. Walter Duffy - Premier Psychiatric Group	805. Firestone reserves any further objections until exhibit is produced by Plaintiffs.
Medical records - Lincoln Surgical Hospital	805. Firestone reserves any further objections until exhibit is produced by Plaintiffs.
Itemized Schedule of Medical Expenses with corresponding medical bills	805. Firestone reserves any further objections until exhibit is produced by Plaintiffs.
Records received from Lincoln Public School re: Jonathan	805. Firestone reserves any further objections until exhibit is produced by Plaintiffs.
Investigator's Motor Vehicle Accident Report	None.
Photographs taken at the scene by the Cass	None.

County Sheriff	
Photographs of the vehicle taken November 15, 2001	901.
Photographs of the vehicle and tire taken after the accident by Michael Reeves	901.
Photographs of Jonathan Bloomer	403, 901.
Meginnis Ford Purchase and Service documents for the 2001 Ford Excursion	801, 802, 805. Firestone reserves any further objections until exhibit is produced by Plaintiffs.
NHTSA Vehicle Owner's Questionnaires, previously labeled as exhibits A-Q, and provided to Plaintiff by Defendant	401, 402, 403, 702, 801, 802, 805, 901. Firestone further objects to this exhibit on the grounds addressed in Firestone's Motion in <i>Limine</i> to exclude Dissimilar Tires and Accidents.
Recall Notice from Bridgestone/Firestone North American Tire, LLC dated March __, 2004	401, 402, 403, 407, 802, 901. Firestone further objects to this exhibit on the grounds addressed in Firestone's Motion in <i>Limine</i> to Exclude Evidence of Voluntary Replacement Program and Brief in Support Thereof.
Bridgestone/Firestone North American Tire, LLC correspondence to NHTSA dated February 26, 2004	401, 402, 403, 407, 802, 901. Firestone further objects to this exhibit on the grounds addressed in Firestone's Motion in <i>Limine</i> to Exclude Evidence of Voluntary Replacement Program and Brief in Support Thereof.
Recall summary dated October 5, 2005	401, 402, 403, 407, 802, 901. Firestone further objects to this exhibit on the grounds addressed in Firestone's Motion in <i>Limine</i> to Exclude Evidence of Voluntary Replacement Program and Brief in Support Thereof.
Bridgestone/Firestone North American Tire, LLC - Claims Report for Sidewall Conditions #1078000892 & 1078000893	401, 402, 403, 805, 901.
Bridgestone/Firestone North American Tire, LLC - Lawsuit Report for Sidewall Conditions #1078000894	401, 402, 403, 805, 901.
Bridgestone/Firestone North American Tire, LLC - Adjustments for Sidewall Conditions #1078000001 & 1078000002	401, 402, 403, 805, 901.
Bridgestone/Firestone North American Tire, LLC - Claims and Lawsuit Report for Sidewall Conditions #1078000003	401, 402, 403, 805, 901.
Curriculum Vitae - David Osborne	801, 802.
Curriculum Vitae - Dr. Robert Arias	801, 802.
Curriculum Vitae - Dr. Tim Watt	801, 802.
Curriculum Vitae - Dr. Mitchell Henry	801, 802.
Larry Bennett deposition transcript	401, 402, 403, 801, 802, 805. Firestone further

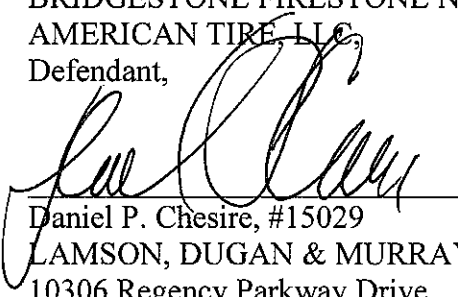
	objects to this exhibit as an improper designation of deposition testimony. Plaintiffs have failed to designate deposition testimony in accordance with the Court's orders.
Debra Bloomer deposition transcript	401, 402, 403, 801, 802, 805. Improper designation of deposition testimony. Plaintiffs have failed to designate deposition testimony in accordance with the Court's orders.
Kristiina Bloomer deposition transcript	401, 402, 403, 801, 802, 805. Firestone further objects to this exhibit as an improper designation of deposition testimony. Plaintiffs have failed to designate deposition testimony in accordance with the Court's orders.
David Osborne deposition transcript	401, 402, 403, 702, 801, 802, 805, 901. Additionally, Firestone objects to this exhibit on the grounds that it is improper opinion evidence in that Mr. Osborne lacks the qualifications to testify, and his methodology and opinions are not scientifically reliable. <i>See Daubert v. Merrell Dow Pharmaceuticals, Inc.</i> , 509 U.S. 579 (1993); <i>Kumho Tire Co. v. Carmichael</i> , 526 U.S. 137 (1999); <i>see also</i> Firestone's Brief in Support of Its Motion to Exclude Expert Testimony of David Osborne. Firestone further objects to this exhibit as an improper designation of deposition testimony. Plaintiffs have failed to designate deposition testimony in accordance with the Court's scheduling orders.
David Osborne deposition video	401, 402, 403, 702, 801, 802, 805, 901. Additionally, Firestone objects to this exhibit on the grounds that it is improper opinion evidence in that Mr. Osborne lacks the qualifications to testify, and his methodology and opinions are not scientifically reliable. <i>See Daubert v. Merrell Dow Pharmaceuticals, Inc.</i> , 509 U.S. 579 (1993); <i>Kumho Tire Co. v. Carmichael</i> , 526 U.S. 137 (1999); <i>see also</i> Firestone's Brief in Support of Its Motion to Exclude Expert Testimony of David Osborne. Firestone further objects to this exhibit as an improper designation of deposition testimony. Plaintiffs have failed to designate deposition testimony in accordance with the Court's scheduling orders.
Dr. Tim Watt deposition transcript	None.

Dr. Tim Watt deposition video	None.
Dr. Robert Arias deposition transcript	None.
Dr. Robert Arias deposition video	None.
Dr. Mitchell Henry deposition transcript	801, 802. Firestone further objects to this exhibit as an improper designation of deposition testimony. Plaintiffs have failed to designate deposition testimony in accordance with the Court's orders.
Dr. Mitchell Henry deposition video	801, 802. Firestone further objects to this exhibit as an improper designation of deposition testimony. Plaintiffs have failed to designate deposition testimony in accordance with the Court's orders.
Commissioner's Standard Ordinary Mortality Table	401, 402, 403, 801, 802.
Subject Tire	901.
Subject Rim/Wheel	901.
Spare Tire	901.
Spare Rim/Wheel	901.

DATED this 4th day of September, 2008.

BRIDGESTONE FIRESTONE NORTH  
AMERICAN TIRE, LLC  
Defendant,

By:

  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served a true and correct copy of the above and foregoing document by ECF electronic filing this 4th day of September, 2008 on the following:

Timothy J. O'Brien  
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A handwritten signature in cursive script, appearing to read "Paul R. Kline", is written over a horizontal line.

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